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2 A PROFESSIONAL CORPORATION  
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7 Attorney for Defendant  
8 STANDARD INSURANCE COMPANY

FILED

08 MAR 20 PM 12:01

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

DEPUTY

9 UNITED STATES DISTRICT COURT  
10 SOUTHERN DISTRICT OF CALIFORNIA

11 SARAH LESLIE,

12 Plaintiff,

13 vs.

14  
15 STANDARD INSURANCE  
16 COMPANY and DOES 1 -10,

17 Defendant.  
18  
19

Case No.:

'08 CV 0520 W JMA

DECLARATION OF REBECCA J.  
JEFFREY IN SUPPORT OF  
DEFENDANT STANDARD  
INSURANCE COMPANY'S NOTICE  
OF REMOVAL

20 I, Rebecca J. Jeffrey, hereby declare as follows:

21 1. I am over 18 years of age and I am a resident of the State of  
22 Washington. My employment address is 900 S.W. Fifth Avenue, Portland, Oregon  
23 97204.

24 2. I have personal knowledge of the facts set forth in this Declaration  
25 and, if called as a witness, could and would testify competently to such facts under  
26 oath.  
27  
28

1           3.     I have been an employee of defendant Standard Insurance Company  
2 ("Standard") since June 8, 2005. My current position/title is Senior Paralegal.

3           4.     Standard is an Oregon corporation, organized and existing under the  
4 laws of the State of Oregon, with its principal place of business in Portland,  
5 Oregon.

6           5.     Standard is licensed to conduct business in 49 of the 50 United States,  
7 the District of Columbia, Guam, and the US Virgin Islands.

8           6.     As of December 31, 2006, the approximate percentage of revenue  
9 generated by Standard per capita in each state in which it does business is as  
10 follows:

11	•	Alabama:	1.04%
12	•	Alaska:	0.68%
13	•	Arizona:	2.61%
14	•	Arkansas:	0.39%
15	•	California:	14.64%
16	•	Colorado:	4.97%
17	•	Connecticut:	0.83%
18	•	Delaware:	0.20%
19	•	District of Columbia:	0.47%
20	•	Florida:	5.35%
21	•	Georgia:	2.76%
22	•	Hawaii:	0.13%
23	•	Idaho:	1.40%
24	•	Illinois:	2.20%
25	•	Indiana:	1.39%
26	•	Iowa:	0.99%
27	•	Kansas:	1.01%

1	• Kentucky:	1.18%
2	• Louisiana:	1.42%
3	• Maine:	0.45%
4	• Maryland:	1.01%
5	• Massachusetts:	1.30%
6	• Michigan:	1.53%
7	• Minnesota:	1.37%
8	• Mississippi:	0.28%
9	• Missouri:	2.86%
10	• Montana:	0.29%
11	• Nebraska:	0.39%
12	• Nevada:	0.68%
13	• New Hampshire:	0.30%
14	• New Jersey:	1.16%
15	• New Mexico:	0.19%
16	• North Carolina:	1.80%
17	• North Dakota:	0.24%
18	• Ohio:	4.10%
19	• Oklahoma:	1.46%
20	• Oregon:	11.46%
21	• Pennsylvania:	2.59%
22	• Rhode Island:	0.18%
23	• South Carolina:	1.19%
24	• South Dakota:	0.05%
25	• Tennessee:	0.82%
26	• Texas:	9.46%
27	• Utah:	1.69%

- 1       • Vermont: 0.19%
- 2       • Virginia: 1.49%
- 3       • Washington: 7.17%
- 4       • West Virginia: 0.21%
- 5       • Wisconsin: 0.72%
- 6       • Wyoming: 0.09%

7       7. Standard's executive and administrative functions are located at its  
 8       headquarters in Oregon. The headquarters in Oregon contain the entire finance,  
 9       accounting, purchasing, treasury, marketing, information systems, internal audit,  
 10      and legal departments and conducts most of the administrative, training, claims  
 11      processing/handling, and human resources functions. Oregon is the base from  
 12      which strategies, procedures, and marketing to obtain all of the income described  
 13      above is determined.

14      8. As of November 7, 2007, Standard employs 3,417 people in 34 states.  
 15      2,388 of the employees, or 69.9%, are employed in Oregon.

16      9. As of December 31, 2006, Standard owns approximately 3.5 million  
 17      square feet of real property with a book value of \$72.4 million. Over 86% of that  
 18      property is located in Oregon with 7% located in California. The remaining 7% is  
 19      located in Idaho, Washington, South Carolina, and Pennsylvania.


20      10. As of September 30, 2007, Standard owns computer hardware,  
 21      artwork, copiers, furniture, personal computers, telephones, and other office  
 22      equipment (hereinafter "Personal Property") purchased at a total cost of  
 23      \$58,139,783. 88% of that Personal Property, or \$51,080,814, is located in Oregon.

24      12. The location of Defendant's principal point of contact for dealing with  
 25      --  
 26      --  
 27      --  
 28

1 the public is Portland, Oregon. Standard's Public Affairs and Communications  
2 departments are located at its headquarters in Portland, Oregon.

3 I declare under penalty of perjury under the laws of Oregon, California and  
4 the United States of America that the foregoing is true and correct.

5 Executed this 13<sup>th</sup> day of March, 2008, in Portland, Oregon.

6  
7   
8 Rebecca J. Jeffrey  
9 Senior Paralegal for Defendant  
Standard Insurance Company

DOCKET No. UNASSIGNED

Leslie v. Standard Insurance Company, et al.

PROOF OF SERVICE BY MAIL

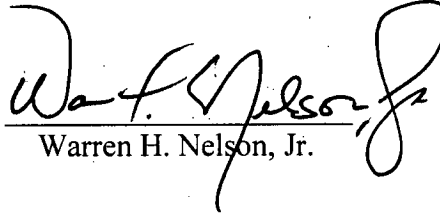
I, Warren H. Nelson, Jr., the undersigned, hereby certify and declare under penalty of perjury that I am over the age of 18 years and am not a party to this action. My business address is Warren H. Nelson, Jr., A Professional Corporation, 6161 El Cajon Blvd., # 273, San Diego, CA 92115, telephone (619) 269-4212, facsimile (619) 501-7948. On the 20<sup>th</sup> day of March 2008, I served a true copy of the foregoing document titled exactly:

DECLARATION OF REBECCA J. JEFFREY IN SUPPORT OF DEFENDANT  
STANDARD INSURANCE COMPANY'S NOTICE OF REMOVAL

By placing it/ in an addressed sealed envelope with correct postage affixed thereto and personally depositing it in the United States mail. I addressed the mailing envelope to the following:

Craig A. Miller, Esq.  
Levine, Steinberg, Miller & Huver  
550 West "C" Street, Suite 1810  
San Diego, CA 92101

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of March 2008 at San Diego, California.

  
Warren H. Nelson, Jr.